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cc: Maywood  
USEPA

From JKM

# Clean Harbors®

ENVIRONMENTAL SERVICES, INC.

US EPA RECORDS CENTER REGION 5



1000878

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(617) 849-1800

WRITER'S DIRECT NUMBER

Extension 4182

LAW DEPARTMENT

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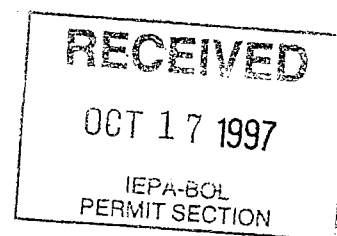
FAX (617) 356-1375

VIA FIRST CLASS MAIL

October 8, 1997

Illinois Environmental Protection Agency  
Attn: Edwin C. Bakowski, Manager  
Permit Section, Bureau of Land  
2200 Churchill Road  
Springfield, Illinois 62794-9276

Re: 0316000051 - Cook County  
Clean Harbors Services, Inc.  
ILD000608471  
Log No. 16  
RCRA Permit  
Quarterly Progress Report



Dear Mr. Bakowski:

Pursuant to Attachment F, Section V of its RCRA Part B Permit, Clean Harbors Services, Inc., hereby submits the quarterly progress report for the period July 1, 1997 through September 30, 1997. This report is divided into two (2) sub-reports, the first addressing corrective action on the original Clean Harbors (former ChemClear) portion of the site, and the second addressing corrective action on the former CWM incinerator portion of the site.

## ORIGINAL CLEAN HARBORS (FORMER CHEMCLEAR) PORTION OF THE SITE

### 1. Estimate of the Percentage of the Investigation Completed:

RFI Phase II/III field activities commenced in April, 1997. As of



Illinois Environmental Protection Agency  
October 8, 1997  
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September 30, 1997, approximately 90% of the proposed RFI Phase II/III field activities and 40% of the project data tabulation have been completed. Considering the project as whole, it is estimated that approximately 75% of the project has been completed.

2. Activities Completed During the Reporting Period:

During this reporting period, Clean Harbors' consultant, Carlson Environmental, Inc. (CEI) continued with and completed the majority of the field activities. With the exception of the borings in SWMU 7, all of the proposed borings have been emplaced and sampled, and all of the groundwater monitoring wells have been installed and developed. CEI also continued the review and tabulation of laboratory results and the preparation of boring logs, well construction logs and site maps.

3. Actual or Proposed Changes to the Workplan or its Implementation:

According to the Agency's condition approval of the RFI Phase II/III Workplan, the proposed field activities were to be completed by September 1, 1997, and the associated report was to be submitted to the Agency by November 1, 1997. Due to the two unforeseen circumstances described Section 4 of the last quarterly report and Section 4 below, the completion of the field activities has been delayed. This is further addressed in Section 5 below.

Aside from the June 27, 1997 scheduling changes previously requested and reported (i.e. extending the field activities completion date to November 1, 1997 and the submittal of the report and certifications to December 31, 1997), Clean Harbors has not made and does not propose any changes to the Workplan or its implementation at this time.

4. Actual or Potential Problems Encountered During Reporting Period:

During the reporting period, two problems were encountered.

- o CEI used Federal Express to ship soil and groundwater samples to the analytical laboratories in Braintree, MA and Kimball, NE. Due to Federal Express' increased shipment volumes during the UPS strike, Federal Express was unable to meet specified delivery times. As a result, certain samples were delivered to



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the laboratory late, their holding temperatures were not maintained, and the samples could not be analyzed.

- o The height of the vegetation on the western portion of the site (SWMUs 8, 9 and 10) varies between approximately 3 feet and 7 feet, and prevents the performance of a topographic survey.

5. Proposal For Correcting any Problems:

The drilling and sampling of several borings had to be repeated to obtain new samples. With the exception of the borings in SWMU 7, CEI completed the majority of "repeat" borings. The "repeat" borings in SWMU 7, which require the use of Level B personal protection equipment, will be completed by November 1, 1997.

CEI will wait to conduct the topographic survey of the western portion of the site until the vegetation withers or dies. In the event that access is not gained in a timely manner, CEI will trim the vegetation so that the topographic survey can be completed by November 1, 1997.

6. Projected Work For the Next Reporting Period:

The projected work for the next reporting period (October 1 through December 31, 1997) includes the following tasks:

- o Completion of the "repeat" borings and sampling in SWMU 7;
- o Measuring static water levels and sampling all eight groundwater monitoring wells;
- o Conducting a topographical survey of the borings in SWMUs 8, 9 and 10; and
- o Completion and submittal of RFI Phase II/III Report and related certifications.

FORMER CWM INCINERATOR PORTION OF THE SITE

1. Estimate of the Percentage of the Investigation Completed:

Not Applicable.



Illinois Environmental Protection Agency  
October 8, 1997  
Page 4 of 4

2. Activities Completed During the Reporting Period:

None.

3. Actual or Proposed Changes to the Workplan or its Implementation:

Not Applicable.

4. Actual or Potential Problems Encountered During Reporting Period:

None.

5. Proposal For Correcting any Problems:

Not Applicable.

6. Projected Work For the Next Reporting Period:

None. The Agency has indicated that further tasks should be held in abeyance pending completion of RFI Phase II/III on the original Clean Harbors (former ChemClear) portion of the site, and approval thereof by the Agency.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Jules B. Selden".

Jules B. Selden  
Senior Counsel

cc: James R. Laubsted - CH  
Richard J. Carlson - CEI  
Valerie A. Baxa - CEI  
David Trainor - D&M  
Brian J. Clarke, Esq. - CWM

B-16



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11-5

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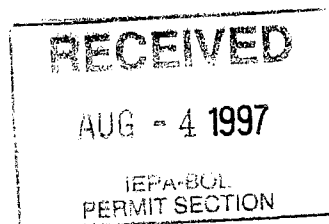
July 30, 1997

Illinois Environmental Protection Agency  
Attn: Edwin C. Bakowski, Manager  
Permit Section, Bureau of Land  
2200 Churchill Road  
Springfield, Illinois 62794-9276

Re: 0316000051 - Cook County  
Clean Harbors Services, Inc.  
ILD000608471  
Log No. 16  
RCRA Permit  
Quarterly Progress Report

Dear Mr. Bakowski:

Pursuant to Attachment F, Section V of its RCRA Part B Permit, Clean Harbors Services, Inc., hereby submits the quarterly progress report for the period April 1, 1997 through June 30, 1997. This report is divided into two (2) sub-reports, the first addressing corrective action on the original Clean Harbors (former ChemClear) portion of the site, and the second addressing corrective action on the former CWM incinerator portion of the site.





Illinois Environmental Protection Agency  
July 30, 1997  
Page 2 of 5

ORIGINAL CLEAN HARBORS (FORMER CHEMCLEAR) PORTION OF THE SITE

1. Estimate of the Percentage of the Investigation Completed:

RFI Phase II/III field activities commenced in April, 1997. As of June 30, 1997, approximately 40% of the proposed RFI Phase II/III field activities and 10% of the project data tabulation have been completed. Considering the project as whole, it is estimated that approximately 30% of the project has been completed.

2. Activities Completed During the Reporting Period:

Approximately 50% of the proposed borings were emplaced and sampled and 50% of the proposed groundwater monitoring wells were installed and developed during the reporting period. Specifically, all proposed borings and four associated well points were emplaced and sampled in SWMU Nos. 11, 12, 13 and 16 and Area of Concern (AOC) Nos. 1 and 2. Groundwater monitoring wells MW-5 through MW-8 were installed and developed. A topographical survey of the aforementioned borings and wells was completed. Investigation of SWMU 10 was commenced and four borings were emplaced and sampled.

During this reporting period, Clean Harbors' consultant, Carlson Environmental, Inc. (CEI) began the review and tabulation of laboratory results and the preparation of boring logs, well construction logs and site maps.

3. Actual or Proposed Changes to the Workplan or its Implementation:

According to the Agency's condition approval of the RFI Phase II/III Workplan, the proposed field activities are to be completed by September 1, 1997, and the associated report is to be submitted to the Agency by November 1, 1997. Due to the two unforeseen circumstances described Section 4 below, Clean Harbors anticipates that the completion of the field activities will be delayed and may not be completed by September 1, 1997. This is further addressed in Section 5 below.

Aside from scheduling changes, Clean Harbors has not made and does not propose any changes in the Workplan or its implementation at this time.



Illinois Environmental Protection Agency  
July 30, 1997  
Page 3 of 5

4. Actual or Potential Problems Encountered During Reporting Period:

During the emplacement of Boring 184 in the center of SWMU 7, field monitoring indicated it was appropriate to upgrade the personal protection equipment (PPE) from Level D to Level C. As the sampling of this boring progressed, workers from CEI and the driller experienced "break-through" in their air-purifying respirator filter cartridges. The remaining investigation of SWMU 7 will be completed in Level B PPE and has necessitated some logistical and scheduling changes (see Section 5 below).

The western portion of the site is undeveloped and used by gulls as a nesting area. When field activities commenced in April 1997, the gulls were beginning to nest and exhibited aggressive behavior. Therefore, field activities were commenced and completed on the eastern portion of the site (with the exception of SWMU 7). These activities were completed on May 14, 1997. Since the gulls were still nesting, an approximately four-week break in the field activities was required. CEI returned to the site on June 16, 1997 to investigate SWMUs 8, 9, and 10, which are located on the undeveloped portion of the site. Over the course of three days, CEI completed four borings in SWMU 10 and walked over the remaining portions of the pier. CEI concluded that driving the all-terrain vehicle (ATV) drill rig to the remaining boring locations would injure or kill the young gulls that cannot yet fly and therefore cannot move out of the drill rig's path. Additionally, the older gulls continue to exhibit aggressive behavior, presumably in an effort to protect the younger gulls.

5. Proposal For Correcting any Problems:

Investigation of SWMU 7 will be completed using Level B PPE. This "Level B work" has been scheduled for July 28 through August 1, 1997, and will be conducted during the Facility's "off" hours of 11 p.m. through 7 a.m. in order to minimize potential exposure to site workers.

Due to the presence of the gulls, the investigation of the pier will be delayed. CEI plans to resume the field work in SWMUs 8, 9, 10 on or about August 4, 1997 and may take between four and six weeks to complete.

On June 27, 1997, a letter was sent to the Agency requesting an extension of the field activities completion date to November 1, 1997 and the submittal of the report and certifications to December 31, 1997.



Illinois Environmental Protection Agency  
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Page 4 of 5

6. Projected Work For the Next Reporting Period:

The projected work for the next reporting period includes the following tasks:

- o Completing the emplacement and sampling of the remaining borings and well points in SWMUs 7, 8, 9 and 10;
- o Installing and developing groundwater monitoring wells MW-1 through MW-4;
- o Measuring static water levels and sampling all eight groundwater monitoring wells; and
- o Conducting a topographical survey of the newly emplaced borings and all monitoring wells.

In addition to the foregoing tasks, CEI will continue to review and summarize the investigation results to prepare for the completion of the report, including:

- o tabulation of the laboratory results and survey data;
- o preparation of boring logs, well construction logs, and site maps; and
- o calculation of the apparent flow direction of near-surface groundwater.

**FORMER CWM INCINERATOR PORTION OF THE SITE**

1. Estimate of the Percentage of the Investigation Completed:

Not Applicable.

2. Activities Completed During the Reporting Period:

None. However, Clean Harbors did complete its review of a draft IEPA memorandum regarding "Overview of Closure and Corrective Action Activities", and, on May 28, 1997, transmitted its comments to the Agency.





Illinois Environmental Protection Agency  
July 30, 1997  
Page 5 of 5

3. Actual or Proposed Changes to the Workplan or its Implementation:

Not Applicable.

4. Actual or Potential Problems Encountered During Reporting Period:

None.

5. Proposal For Correcting any Problems:

Not Applicable.

6. Projected Work For the Next Reporting Period:

None. The Agency has indicated that further tasks should be held in abeyance pending completion of RFI Phase II/III on the original Clean Harbors (former ChemClear) portion of the site.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jules B. Selden".

Jules B. Selden  
Senior Counsel

cc: James R. Laubsted - CH  
Richard J. Carlson - CEI  
Valerie A. Farrell - CEI  
David Trainor - D&M  
Brian J. Clarke, Esq. - CWM



ENVIRONMENTAL SERVICES, INC.

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WRITER'S DIRECT NUMBER

Extension 4182

LAW DEPARTMENT

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January 23, 1997

Illinois Environmental Protection Agency  
Attn: Edwin C. Bakowski, Manager  
Permit Section, Bureau of Land  
2200 Churchill Road  
Springfield, Illinois 62794-9276

Re: 0316000051 - Cook County  
Clean Harbors Services, Inc.  
(Formerly Clean Harbors of Chicago, Inc.)  
ILD000608471  
Log No. 16  
RCRA Permit  
Quarterly Progress Report

Dear Mr. Bakowski:

Pursuant to Attachment F, Section V of its RCRA Part B Permit, Clean Harbors Services, Inc., formerly known as Clean Harbors of Chicago, Inc., hereby submits the quarterly progress report for the period October 1, 1996 through December 31, 1997. Please note that this report only addresses the portion of the site which was formerly the CWM incinerator site. The original Clean Harbors site is addressed in a separate report.

1. Estimate of the Percentage of the Investigation Completed:

Not Applicable.

2. Activities Completed During the Reporting Period:

During the reporting period, Clean Harbors completed its review of the Agency's draft position paper and determination regarding the

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Illinois Environmental Protection Agency  
January 23, 1996  
Page 2

Supplemental RCRA Facility Investigation (RFI) Phase I Work Plan and the Initial Corrective Measures Program Report. On October 8, 1996, Clean Harbors responded to the Agency, agreeing with its position and determination.

3. Actual or Proposed Changes to the Workplan or its Implementation:

Not Applicable.

4. Actual or Potential Problems Encountered During Reporting Period:

None.

5. Proposal For Correcting any Problems:

Not Applicable.

6. Projected Work For the Next Reporting Period:

None. The Agency has indicated that further tasks should be held in abeyance pending completion of RFI Phase II/III on the original Clean Harbors (former ChemClear) portion of the facility.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jules B. Selden".

Jules B. Selden  
Senior Counsel

cc: David Trainor - D&M  
James R. Laubsted  
Richard J. Carlson - CEI  
Valerie A. Farrell - CEI  
Brian J. Clarke, Esq. - CWM



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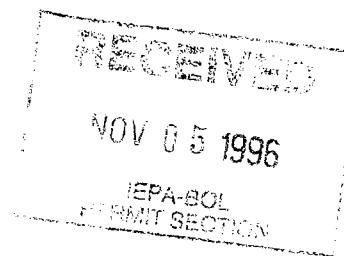
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October 29, 1996

Illinois Environmental Protection Agency  
Attn: Edwin C. Bakowski, Manager  
Permit Section, Bureau of Land  
2200 Churchill Road  
Springfield, Illinois 62794-9276

Re: 0316000051 - Cook County  
Clean Harbors Services, Inc.  
(Formerly Clean Harbors of Chicago, Inc.)  
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1. Estimate of the Percentage of the Investigation Completed:

One hundred percent (100%) of RFI Phase I has been completed.

2. Activities Completed During the Reporting Period:

During September Clean Harbors received the Agency's draft conditional approval letter (with the exception of groundwater



Illinois Environmental Protection Agency  
October 29, 1996  
Page 2

comments) for the RCRA Facility Investigation Phase II/III Work Plan. A review of the draft was commenced.

3. Actual or Proposed Changes to the Workplan or its Implementation:

Not Applicable.

4. Actual or Potential Problems Encountered During Reporting Period:

None.

5. Proposal For Correcting any Problems:

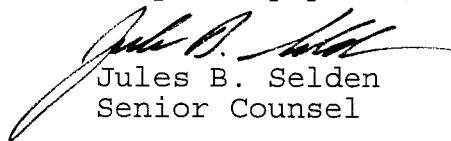
Not Applicable.

6. Projected Work For the Next Reporting Period:

The projected work for the next reporting period (October 1 through December 31, 1996) consists of completing review of groundwater comments (received earlier this month) and responding to the Agency's draft conditional approval letter.

If you have any questions, please do not hesitate to contact me.

Very truly yours,



Jules B. Selden  
Senior Counsel

cc: James R. Laubsted  
Richard J. Carlson - CEI  
Valerie A. Farrell - CEI  
David Trainor - D&M

cc: Maynard  
USEPA

B-16



ENVIRONMENTAL SERVICES, INC.

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October 29, 1996

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2200 Churchill Road  
Springfield, Illinois 62794-9276

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1. Estimate of the Percentage of the Investigation Completed:

Not Applicable.

2. Activities Completed During the Reporting Period:

During the reporting period, Clean Harbors received and reviewed the Agency's draft position paper and determination regarding the

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RCRA  
PERMIT OFFICE



Illinois Environmental Protection Agency  
October 29, 1996  
Page 2

Supplemental RCRA Facility Investigation (RFI) Phase I Work Plan  
and the Initial Corrective Measures Program Report.

3. Actual or Proposed Changes to the Workplan or its Implementation:

Not Applicable.

4. Actual or Potential Problems Encountered During Reporting Period:

None.

5. Proposal For Correcting any Problems:

Not Applicable.

6. Projected Work For the Next Reporting Period:

The projected work for the next reporting period (October 1 through December 31, 1996) is to respond to the Agency's draft position paper and determination referenced in item 2 above.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Jules B. Selden".

Jules B. Selden  
Senior Counsel

cc: David Trainor - D&M  
James R. Laubsted  
Richard J. Carlson - CEI  
Valerie A. Farrell - CEI  
Brian J. Clarke, Esq. - CWM



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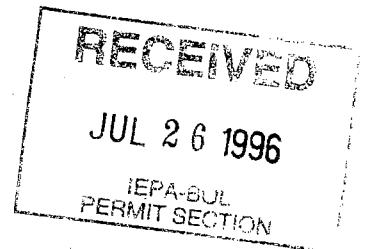
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July 24, 1996

Illinois Environmental Protection Agency  
Attn: Edwin C. Bakowski, Manager  
Permit Section, Bureau of Land  
2200 Churchill Road  
Springfield, Illinois 62794-9276

Re: 0316000051 - Cook County  
Clean Harbors of Chicago, Inc.  
ILD000608471  
Log No. 16  
RCRA Permit  
Quarterly Progress Report



Dear Mr. Bakowski:

Pursuant to Attachment F, Section V of its RCRA Part B Permit, Clean Harbors of Chicago, Inc. hereby submits the quarterly progress report for the period April 1, 1996 through June 30, 1996. Please note that this report only addresses the portion of the site which was formerly the CWM incinerator site. The original Clean Harbors site is addressed in a separate report.

1. Estimate of the Percentage of the Investigation Completed:

The Supplemental RFI Phase I has not yet commenced.

2. Activities Completed During the Reporting Period:

During the reporting period, Clean Harbors awaited the completion of the Agency's review of the Supplemental RCRA Facility Investigation (RFI) Phase I Work Plan and the Initial Corrective Measures Program Report.





Illinois Environmental Protection Agency  
July 24, 1996  
Page 2

3. Actual or Proposed Changes to the Workplan or its Implementation:  
Not Applicable.

4. Actual or Potential Problems Encountered During Reporting Period:  
None.

5. Proposal For Correcting any Problems:  
Not Applicable.

6. Projected Work For the Next Reporting Period:

The projected work for the next reporting period (July 1 through September 30, 1996) is to resolve any Agency comments on the Supplemental RFI Phase I Work Plan and/or the Initial Corrective Measures Program Report. This activity depends upon the Agency's completion of its review and whether there are any comments.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jules B. Selden".

Jules B. Selden  
Senior Counsel

cc: David Trainor - D&M  
James R. Laubsted  
Richard J. Carlson - CEI  
Valerie A. Farrell - CEI  
Brian J. Clarke, Esq. - CWM



ENVIRONMENTAL SERVICES, INC.

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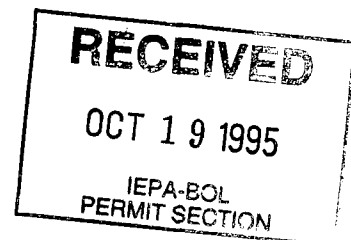
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October 16, 1995

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Dear Mr. Bakowski:

Pursuant to Attachment F, Section V of its RCRA Part B Permit, Clean Harbors of Chicago, Inc. hereby submits a quarterly progress report for the period July 1, 1995 through September 30, 1995. Please note that this report only addresses the original Clean Harbors site. The portion of the site which was formerly the CWM incinerator site is addressed in a separate report.

1. Estimate of the Percentage of the Investigation Completed:

One hundred percent (100%) of RFI Phase I has been completed.

2. Activities Completed During the Reporting Period:

Not Applicable. During the reporting period, the Agency was reviewing the RFI Phase I Report which was submitted on June 30, 1995.



Illinois Environmental Protection Agency

October 16, 1995

Page 2

3. Actual or Proposed Changes to the Workplan or its Implementation:

Not Applicable.

4. Actual or Potential Problems Encountered During Reporting Period:

None.

5. Proposal For Correcting any Problems:

Not Applicable.

6. Projected Work For the Next Reporting Period:

The projected work for the next reporting period (October 1 through December 31, 1995) consists of responding to any questions or comments which the Agency may have as a result of its review of the RFI Phase I Report. Depending upon the date of the Agency's approval of the RFI Phase I Report, preparation of the RFI Phase II Workplan may commence during the next reporting period.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Jules B. Selden".

Jules B. Selden  
Corporate Attorney

cc: Richard J. Carlson - CEI  
Valerie A. Farrell - CEI  
James R. Laubsted  
David Trainor - D&M